

Mr. Chris Berg
Jasper Seating Company, Inc.
P.O. Box 231
Jasper, Indiana 47547-0231

Re: 117-11892
Minor Permit Revision to
FESOP No.: 117-5436-00011

Dear Mr. Berg:

Jasper Seating Company, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on December 9, 1996 for a wood furniture manufacturing facility. A letter requesting a change to woodworking status was received on February 15, 2000.

Jasper Seating has requested that woodworking unit EU13 be removed from Sections A.2 and D.2 of the issued FESOP and listed as an insignificant activity, pursuant to 326 IAC 2-7-1 (21)(G)(xxx).

Pursuant to 326 IAC 2-8-1, all definitions listed in 326 IAC 2-7, shall apply to 326 IAC 2-8. Therefore, the woodworking EU13 shall be considered an insignificant woodworking operation pursuant to 326 IAC 2-8-1 and 326 IAC 2-7-1(21)(G)(xxx).

Since there are no units being installed and emissions remain unaffected, then pursuant to 326 IAC 2-8.1-11.1(d), this modification is considered a Minor Permit Revision. Pursuant to 326 IAC 2-8.1-11.1(d), the following changes have been made to the permit to incorporate EU13 as insignificant and identify the corresponding requirements:

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

- ~~(b) One (1) woodworking unit, identified as EU13.~~

~~The woodworking consists of cutting performed composite board panels for use in assembling wood desks, at a maximum capacity of 5 units per hour, exhausting through stack ID# V16 and controlled by a baghouse system and closed loop cyclone.~~

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20) and 326 IAC 2-7-1(21)(G)(xxx):

- (e) One (1) woodworking unit, identified as EU13.**

The woodworking consists of cutting performed composite board panels for use in assembling wood desks, at a maximum capacity of 5 units per hour, exhausting through stack ID# V16 and controlled by a baghouse system and closed loop cyclone.

SECTION D.2

FACILITY OPERATION CONDITIONS

Insignificant activities:

One (1) woodworking unit, identified as EU13. The woodworking consists of cutting performed composite board panels for use in assembling wood desks, at a maximum capacity of 5 units per hour, exhausting through stack ID# V16 and controlled by a baghouse system and closed loop cyclone.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the woodworking operations shall not exceed 2.6 pounds per hour. This requirement shall be met by operating the baghouse at all times and performing ~~all the~~ monitoring requirements ~~specified in section D.2.2.~~

D.2.2 Baghouse Limitations [326 IAC 2-8-1][326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for FESOP permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If

testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall

be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxx)(DD)]

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.26 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling woodworking operations **when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.** All defective bags shall be replaced. ~~A record shall be kept of the results of the inspection and the number of bags replaced.~~

D.2.37 Visible Emissions Notations

~~Visible emission notations of all exhausts to the atmosphere from cyclones and baghouses shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.~~

Should the source elect to not have the woodworking operations considered an insignificant activity for FESOP permitting purposes, the Method 22 readings required in Condition D.2.2(c) are not required, and will be replaced by the following:

- (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

D.2.48 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- a) The affected compartments will be shut down immediately until the **failed** units have been **repaired or** replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- b) ~~Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

~~D.2.5 Preventive Maintenance [326 IAC 2-8-4(9)]~~

~~A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility.~~

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

~~D.2.69 Operational Parameters~~

~~That the Permittee shall maintain daily record at the stationary source of the visible observations.~~

Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.2(c) and Condition D.2.6 and the dates the vents are redirected.
- (b) To document compliance with Condition D.2.2(c) or Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

If you have any questions on this matter, please call Kimberly Titzer at (800) 451-6027, press 0 and ask for extension 3-8396, or dial (317) 233-8396.

Jasper Seating Company, Inc.
French Lick, Indiana
Permit Reviewer: Kimberly Titzer

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Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

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cc: File - Orange County
Air Compliance – Ray Schick
Permit Tracking - Janet Mobley

SECTION D.2

FACILITY OPERATION CONDITIONS

Insignificant activities:

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Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

That pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the woodworking operations shall not exceed 2.6 pounds per hour. This requirement shall be met by operating the baghouse at all times and performing all monitoring requirements.

D.2.2 Baghouse Limitations [326 IAC 2-8-1][326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for FESOP permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxx)(DD)]

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for FESOP permitting purposes, the Method 22 readings required in Condition D.2.2(c) are not required, and will be replaced by the following:

- (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.8 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.2(c) and Condition D.2.6 and the dates the vents are redirected.
- (b) To document compliance with Condition D.2.2(c) or Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.